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**BEFORE THE
LABOR AND INDUSTRIAL RELATIONS COMMISSION
JEFFERSON CITY, MISSOURI**

**LABOR AND INDUSTRIAL
RELATIONS COMMISSION**

**Objection to Annual Wage Order No. 12
Objection Filed by hth companies, inc.
To Adair County, Audrain County, Boone County and Cape Girardeau County**

Asbestos Workers, Local Union No. 1,

Intervenors

MOTION TO INTERVENE

COME NOW Asbestos Workers Local Union No. 1, (hereinafter referred to as "Intervenors"), and, as grounds for their intervention, state as follows:

1. Intervenors, with their offices in St. Louis, Missouri, and having jurisdiction over approximately half of the State of Missouri, including the Counties of Adair, Audrain, Boone and Cape Girardeau, represent members who perform work with signatory contractors to collective bargaining agreements throughout the State of Missouri. These individuals perform work often denominated under 8 C.S.R. 30-3.060 under the occupational title of Asbestos Worker.

2. The hours submitted by contractors signatory to agreements with Local Union No. 1 predominate in the Counties of Adair, Audrain, Boone and Cape Girardeau.

3. The Intervenor has a specific interest in assuring that the prevailing wage as established by the hours performed by its members is protected and therefore constitute parties over whom an ultimate determination may affect their interest and should be permitted to intervene pursuant to Section 290.210, R.S.Mo., *et seq.*

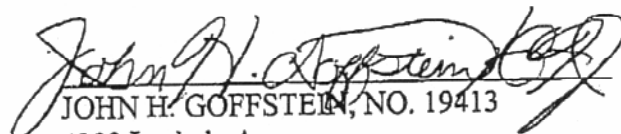
4. Intervenors have reviewed Objections filed on behalf of hth companies, inc., and the

attachment filed by the Objectors and state affirmatively that the Division's and Agency's hourly rates for the locality are correct and that the Objections are without merit.

WHEREFORE, Intervenor respectfully request authority and permission to intervene in this matter.

Respectfully submitted,

BARTLEY GOFFSTEIN, L.L.C.



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CERTIFICATE OF SERVICE

An original and two (2) copies of the foregoing was served on Pamela Hofmann, Secretary to Commission, Labor and Industrial Relations Commission, 3315 West Truman Boulevard, P.O. Box 599, Jefferson City, Missouri 65102-0599, by **Certified Mail**; and a copy was served on the following individuals by placing same, postage prepaid, in the U.S. mails this 19th day of April 2005:

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